

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

IN RE VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION	MDL No. 2875
THIS DOCUMENT RELATES TO ALL CASES	HON. ROBERT B. KUGLER MDL NO. 19-2875 (RBK)

**PLAINTIFFS' NOTICE OF MOTION TO
PRECLUDE IMPROPER DEPOSITION DESIGNATIONS**

TO: Jessica Davidson, Esq,
SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP
One Manhattan West
New York, New York 10001
Attorneys for the ZHP Defendants

Lori G. Cohen, Esq.
GREENBERG TRAURIG, LLP
Terminus 200
3333 Piedmont Road NE
Suite 2500
Atlanta, Georgia 30305
Attorneys for the Teva Defendants

Jay Philip Lefkowitz, Esq.
KIRKLAND & ELLIS LLP
601 Lexington Avenue
New York, New York 10022
Attorneys for the Torrent Defendants

PLEASE TAKE NOTICE that Plaintiffs shall move before the Honorable
Robert B. Kugler, U.S.D.J., and the Honorable Thomas I. Vanaskie, Special Master,

at the United States District Court for the District of New Jersey, 1 John F. Jerry Plaza, 4th and Cooper Streets, Camden, New Jersey, for an Order precluding improper deposition designations, as described in greater detail in the accompanying brief and proposed order.

PLEASE TAKE FURTHER NOTICE that Plaintiffs shall rely upon the brief, supporting certification, and proposed order filed herewith.

PLEASE TAKE FURTHER NOTICE that Plaintiffs request oral argument pursuant to L. Civ. R. 78.1.

MAZIE SLATER KATZ & FREEMAN, LLC
Attorneys for Plaintiffs

By: /s/ Adam M. Slater

Dated: February 16, 2024

CERTIFICATE OF SERVICE

I hereby certify that on February 16, 2024, I electronically filed this motion, a supporting brief, a supporting certification, and proposed order, with the Clerk of the Court using CM/ECF system which will send notification of such filing to the CM/ECF participants registered to receive service in this MDL. In addition, I hereby certify that copies of foregoing documents will be served contemporaneous to filing via email on the Court, Special Master, and Jessica Davidson at Jessica.Davidson@skadden.com, Lori Cohen at CohenL@gtlaw.com, and Jay Lefkowitz at lefkowitz@kirkland.com.

MAZIE SLATER KATZ & FREEMAN, LLC
Attorneys for Plaintiffs

By: /s/ Adam M. Slater

Dated: February 16, 2024